



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MAR 16 2016

CERTIFIED MAIL 70091680 0000 7677 9548
RETURN RECEIPT REQUESTED

Mr. Mark Tomasik
Vice President of Quality Assurance and Environmental Health and Safety
March Coatings, Incorporated
160 Summit Street
Brighton, Michigan 48116

Re: Notice of Violation
Compliance Evaluation Inspection
MID 982 604 001

Dear Mr. Tomasik:

On January 26, 2016 a representative of the U.S. Environmental Protection Agency inspected the March Coatings, Incorporated (March Coatings) facility located in Brighton, Michigan. As a small quantity generator of hazardous waste, March Coatings is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate March Coatings' compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by March Coatings, EPA's review of records pertaining to March Coatings, and the inspector's observations, EPA has determined that March Coatings had unlawfully stored hazardous waste without a license or interim status as a result of March Coatings' failure to comply with a certain condition for a license exemption under Mich. Admin. Code r. 299.9306(4) [40 C.F.R. § 262.34(d)]. EPA has identified the license exemption conditions with which March Coatings was out of compliance at the time of the inspection in paragraph 1, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS

At the time of the inspection, March Coatings was out of compliance with the following small quantity generator license exemption conditions:

1. Emergency Coordinator Required Phone Posting

Under Mich. Admin. Code r. 299.9306(4)(g) [40 C.F.R. § 262.34(d)(5)(I)], a small quantity generator must post next to the telephone, the name and telephone number of the emergency coordinator; the location of fire extinguishers and spill control material and, if present, fire alarm; and the telephone number of the fire department, unless the facility has a direct alarm.

At the time of the inspection, March Coatings had not posted the required information next to a plant telephone. On January 28, 2016, March Coatings sent an e-mail to EPA with an updated Plant Layout which included the Emergency Coordinator contact information. EPA considers this violation resolved.

Summary: By failing to comply with the conditions for a license exemption, above, March Coatings became an operator of a hazardous waste storage facility, and was required to obtain a Michigan hazardous waste storage license. March Coatings failed to apply for such a license. March Coatings' failure to apply for and obtain a hazardous waste storage license violated the requirements of Mich. Admin. Code r. 299.9502(1), 299.9508 and 299.9510 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)].

OTHER VIOLATIONS

March Coatings violated the following generator requirements:

2. Universal Waste Requirement

Under Mich. Admin. Code r. 299.9228(4)(c)(ii) [40 C.F.R. § 273.13(d)], a small quantity handler of universal waste must be managed in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with the contents of the lamps and will prevent breakage during normal handling conditions. The packaging must remain closed and lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. Under Mich. Admin. Code r. 299.9228(4)(c)(iv) [40 C.F.R. § 273.14(e)], a small quantity handler of universal waste must label with the words "Universal Waste Electric Lamps," "Waste Electric Lamps," or "Used Electric Lamps." Under Mich. Admin. Code r. 299.9228(4)(a) [40 C.F.R. § 273.15(a)], a small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler, unless the requirements of paragraph (b) of this rule are met.

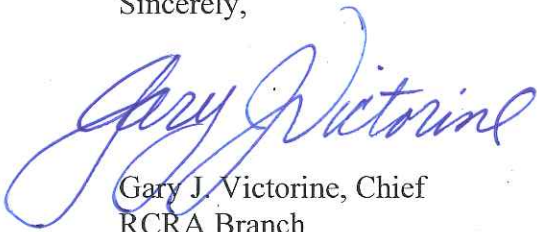
March Coatings is a small quantity handler of universal waste because it does not accumulate 5,000 kilograms or more of universal waste at any time. At the time of the inspection, March Coatings had accumulated two boxes of used fluorescent lamps in the Maintenance Shop, see photograph number 1. The boxes were not labeled "Universal Waste Electric Lamps," "Waste Electric Lamps," or "Used Electric Lamps," and one of the boxes was open. In addition, according to March Coating personnel, the last out-bound shipment of used electric lamps was in 2012.

At this time, EPA is not requiring March Coatings to apply for a Michigan hazardous waste storage permit because it established compliance with the conditions for a permit exemption outlined in paragraphs 1, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the universal waste requirements. You should submit your response to Walt Francis, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Walt Francis, of my staff, at 312-353-4921 or at francis.walt@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Larry Bean, MDEQ (beanl@michigan.gov)
John Craig, MDEQ (craigj@michigan.gov)
Lonnie Lee, MDEQ (leel@michigan.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: MARCH COATINGS, INC.
FACILITY U.S. EPA ID NO.: MID 982 604 001
FACILITY TYPE: Small Quantity Generator
FACILITY ADDRESS: 160 Summit Street
Brighton, Michigan 48116
U.S. EPA REPRESENTATIVE: Walt Francis
DATE OF INSPECTION: January 26, 2016
SIC CODE: 3479 – Coating, Engraving, and Allied Services, Not
Elsewhere Classified
NAICS CODE: 332812 – Metal Coatings, Engraving (Except Jewelry and
Silverware), and Allied Services to Manufacturers

PREPARED BY: Walt Francis
Walt Francis
Environmental Scientist

2/17/2016
Date

APPROVED BY: Julie Morris
Julie Morris, Chief
Compliance Section 2
RCRA Branch

2/17/2016
Date

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the March Coating, Inc. (March Coating) facility located at 160 Summit Street, Brighton, Michigan to determine compliance with the Resource Conservation and Recovery Act (RCRA) and the Michigan Administrative Code (MAC), with respect to March Coating's management of hazardous waste, universal waste and used oil.

Participants

United States Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Representatives of March Coatings -
Mark Tomasik, Vice President of Quality Assurance and Environmental Health and Safety
Randy Wangen, Senior Project Manager

Site Description/Background Information

The March Coatings facility in Brighton, Michigan operates a brake rotor wet spray coating operation and an Ecoat operation for other automotive parts. March Coatings receives various automotive parts for Ecoating and brake rotors which are sprayed with a rust preventative coating. Once coated, the brake rotors and Ecoated parts are shipped off-site to various automotive assembly plants. March Coatings has a second location in Brighton, Michigan at 1279 Rickett Road (MI0001019744) (Plant #2), and is affiliated with Onsite Finishing in Flint, Michigan (MIK368735593). March Coatings has been at this location since 1984 and currently has 65 employees and operates two shifts. Used spray booth filters are generated in the automated spraying area. March Coatings uses a paint that contains aluminum and zinc. The used spray booth filters are placed in 55-gallon containers containing water. March Coatings, currently handles the 55-gallon containers of used spray booth filters as hazardous waste while accumulating onsite. For off-site shipment, they are sent with a hazardous waste manifest with the Michigan Liquid Industrial Waste code "029L". At the time of the inspection, the March Coatings facility was operating as a Small Quantity Generator (SQG) of hazardous waste. Based on information in the EPA 2013 Comprehensive Biennial Report System, March Coatings sent seven shipments for a total of 21.4 tons of "Paint Booth Filters and Water" to Petrochem Processing Group, Detroit, Michigan (MID980615298). Other wastes include used shot blast media material, which is shipped off-site as a non-hazardous waste, and used fluorescent lamps are shipped Superior Special Services. The MDEQ Waste Data System (WDS) out-bound manifest report indicated one shipment of hazardous waste that was shipped to Petro-Chem Processing Group of Nortru LLC, Detroit, Michigan (MID980615298) on June 26, 2014 and January 24, 2012. No other shipments of hazardous waste are shown in the MDEQ WDS in 2012, 2013, 2014, or 2015.

Opening Conference

U.S. EPA representative Walt Francis arrived at the March Coatings facility at approximately 10:45 a.m. Inspector Francis asked for Mr. Mark Tomasik. Inspector Francis introduced himself to Mr. Mark Tomasik. Mr. Tomasik brought Inspector Francis to his office. Mr. Randy Wangen arrived at the office, a short time later. Inspector Francis presented his credentials, and informed them of the nature, scope, and procedures of the inspection. The inspection was conducted by U.S. EPA. MDEQ personnel were unable to participate in the inspection. Mr. Tomasik provided the inspector with a brief overview of the March Coatings facility, and provided information on the hazardous waste and solid wastes that are generated, and shipped off-site. Specifically, Mr. Tomasik explained that they are utilizing a new rust preventative spray that has different characteristics than the previous spray. However, they are still handling the used spray booth filters as hazardous waste while on-site. Inspector Francis asked Mr. Tomasik about off-site shipments of used oil. Mr. Tomasik told the inspector that when routine service is performed on the fork lift trucks or the air compressor, service personnel take the used oil off-site. March Coatings personnel did not make a Confidential Business Claim on the information gathered during the inspection. Mr. Tomasik allowed the inspector access to the facility to conduct the inspection.

Site Tour

The walk-through began in the Maintenance Shop. Mr. Tomasik showed the inspector an area where used fluorescent lamps are accumulated, see photograph number 1. The walk-through continued to the brake rotor robotic painting line. Inspector Francis asked Mr. Wangen which solvent was used to clean the paint line. Mr. Wangen showed Inspector Francis a 55-gallon container labeled "Parachlorobenzotrifluoride". Mr. Tomasik showed Inspector Francis a large explosion proof cabinet which contained two 55-gallon drums labeled hazardous waste. Inspector Francis observed that the drums were dated "1/15/2016" and "12/21/2015", see photograph number 2. Mr. Tomasik also showed Inspector Francis the weekly inspection log. The walk-through continued to the media shot blaster. Inspector Francis asked Mr. Tomasik how the used media blast was handled. Mr. Tomasik told Inspector Francis that it is shipped out as a non-hazardous waste, see photograph number 3. The walk-through continued to the Ecoat line. Mr. Tomasik showed Inspector Francis the Ecoat process. Inspector Francis observed metal automotive parts waiting to be Ecoated. The walk-through continued to the wastewater treatment plant. Mr. Tomasik showed Inspector Francis the wastewater treatment sludge and filter press, see photograph number 4. Mr. Wangen told Inspector Francis that the wastewater filter cake is taken outside to a 20 cubic yard container.

The inspection group then returned to Mr. Tomasik's office to review records.

Records Review

The inspector reviewed three years of hazardous waste manifest records, non-hazardous waste manifests, contingency plan, and weekly inspection records. Inspector Francis reviewed a June 26, 2014 shipment of Ignitable Waste (D001) and Used Spray Booth Filters (029L). Mr. Tomasik told Inspector Francis that an operator thinned the paint too much and were unable to use it, so it was shipped off-site as hazardous waste. The last off-site shipment of used spray booth filters was on January 27, 2015 and the last shipment of used shot blast media was on March 17, 2015. Wastewater treatment sludge is shipped to ADS/Arbor Hills Landfill, Northville, Michigan. Inspector Francis reviewed used spray booth filter waste and solids from zinc phosphate tank from zinc phosphating of steel parts and Ecoating wastewater treatment sludge determination records from Advanced Resource Recovery, Inkster, Michigan, Phillips Services Corporation (PSC), Monroe, and Michigan and Lakeland Laboratories, Inc., Pinckney, Michigan.

Closing Conference

The inspector conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. March Coatings would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, completed inspection checklists and a copy of the photographs taken during the inspection. Inspector Francis provided a U.S. EPA Small Business Resources information sheet, a U.S. EPA Region 5 Pollution Prevention contact sheet, and a Michigan Technical Assistance Program information sheet to Mr. Tomasik.

Attachments

Inspection Checklists.

Photographs.

Department of Environmental Quality
HAZARDOUS WASTE INSPECTION

INSPECTION DATE 1/26/2016 GEN. I.D.# MID982604001 WDS ID# _____

SITE SPECIFIC NAME March Coating, Inc. - Plant #1

SITE LOCATION ADDRESS 160 Summit Street

CITY Brighton ZIP: 48116 COUNTY Livingston

Reason for Inspection: ☒ CEI ☐ FCI ☐ FUI ☐ CSE ☐ CAC ☐ COMPLAINT ☐ NRR ☐ OTHER

WASTE CODE	PROCESS WASTE IS GENERATED FROM	
D001/029L	Used Spray Booth Filter	
028L		
PERSON(S) INTERVIEWED	TITLE	TELEPHONE NUMBER
MARK TOMASK	VP, O&A + EHS	810-2296464 x 221
Randy Wagoner	Senior Project Manager	810-2290829 x 127
INSPECTOR'S NAME	AGENCY	TELEPHONE NUMBER
	MICHIGAN DEPT OF ENVIRONMENT QUALITY	
Walt Francis	U.S. EPA, Region 5	312-353-4921

PRIMARY BUSINESS OF FACILITY: Facility specializing in Ecoating and Wet-spray painting services.

APPROX./AVG. # OF EMPLOYEES: 65 DAYS/HRS OPERATION 2 SHIFTS

FACILITY SIZE 75,000 sq. ft. PHOTOS TAKEN ☐ YES ☐ NO

CHRONOLOGY OF INSPECTION & AREAS INSPECTED :

- | | | |
|----------|----------|----------|
| 1) _____ | 4) _____ | 7) _____ |
| 2) _____ | 5) _____ | 8) _____ |
| 3) _____ | 6) _____ | 9) _____ |

SUMMARY OF FINDINGS: (add sketch of site noting Haz Waste locations OR _____ copy of site plan provided by site attached)

See Inspection Report.

CHECK FORMS USED	GENERAL CATEGORIES OF FACILITIES
	C E S Q G
	LIW GENERATOR
<input checked="" type="checkbox"/>	SMALL QUANTITY GENERATOR
	SMALL QUANTITY GEN TANK SYSTEM
	GENERATOR
	GENERATOR TANK SYSTEM
	SMALL QTY UNIVERSAL WASTE HANDLER
	LARGE QTY UNIVERSAL WASTE HANDLER
	USED OIL ACTIVITIES
	TRANSPORTER _____ LIW _____ HAZ WST
	WOOD PRESERVER

Does the facility discharge a process wastewater to the local POTW that would otherwise be a RCRA regulated waste? _____no _____yes (If yes, send copy of this cover sheet to SWQD).

Does Is the facility subject to air emission standards for process vents managing hazardous waste with organic concentrations of at least 10 ppmw? If yes, circle the type of operation(s): DISTILLATION FRACTIONATION THIN-FILM EVAPORATION SOLVENT EXTRACTION AIR OR STREAM STRIPPING (If yes, send a copy of this cover sheet to AQD).

CHECK FORMS USED	GENERAL CATEGORIES OF FACILITIES
	SITE SPECIFIC PERMITTED T S D F
	PERMITTED GENERAL T S D F
	INTERIM GENERAL T S D F
	GENERATOR APPENDIX
	TANK SYSTEM
	PERMITTED SURFACE IMPOUNDMENT
	PERMITTED WASTE PILE
	PERMITTED LAND TREATMENT
	PERMITTED LANDFILL
	MISCELLANEOUS UNITS
	PERMITTED ORGANIC AIR EMISSIONS- PROCESS VENTS
	PERMITTED ORGANIC AIR EMISSIONS- EQUIPMENT LEAKS
	INTERIM GW MONITORING (USE WITH SUBPARTS K,L, M, & N)
	INTERIM SURFACE IMPOUNDMENT
	INTERIM WASTE PILE
	INTERIM LAND TREATMENT
	INTERIM LANDFILL
	INTERIM CHEMICAL, PHYSICAL & BIOLOGICAL TREATMENT
	INTERIM ORGANIC AIR EMISSIONS FROM PROCESS VENTS
	INTERIM ORGANIC AIR EMISSIONS FROM EQUIPMENT LEAKS

INSPECTOR'S SIGNATURE

Walt J

DATE

1/26/2006

**Department of Environmental Quality
SMALL QUANTITY GENERATOR INSPECTION FORM**

Facility's Name March Coatings, Inc. Part 3 Rules
Date 1/26/2016 ID# MID982604001 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
D001	<i>Paint Booth Filter</i>	

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS
(NI - Not Inspected N/A - Not Applicable)

WASTE DETERMINATION (Rule 302: 40 CFR 262.11)

		YES	NO
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11)	262A	<input checked="" type="checkbox"/>	NI N/A
a) Copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))	262D	<input checked="" type="checkbox"/>	NI N/A
b) Re-evaluated waste when changes in materials or process? (Rule 302(3))	262A	<input checked="" type="checkbox"/>	NI N/A

IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)

2. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	262A	<input checked="" type="checkbox"/>	NI N/A
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MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

3. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	262D	<input checked="" type="checkbox"/>	NI N/A
4. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.40(a))	262D	<input checked="" type="checkbox"/>	NI N/A
5. Manifests, prepared by the generator (Rule 304(1)(b): 40 CFR 262.20(a)), contain the following?	262B	<input checked="" type="checkbox"/>	NI N/A
a) manifest document number. (Rule 304(1)(b): 40 CFR 262.20(a))	262B	<input checked="" type="checkbox"/>	NI N/A
b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a))	262B	<input checked="" type="checkbox"/>	NI N/A
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a))	262B	<input checked="" type="checkbox"/>	NI N/A
d) name, address & ID # of TSDF. (Rule 304(1)(b): 40 CFR 262.20(b)&(c))	262B	<input checked="" type="checkbox"/>	NI N/A
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a))	262B	<input checked="" type="checkbox"/>	NI N/A
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a))	262B	<input checked="" type="checkbox"/>	NI N/A
g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a))	262B	<input checked="" type="checkbox"/>	NI N/A
h) generator signature, initial transporter & date of acceptance? (Rule 304(1)(b): 40 CFR 262.20(a))	262B	<input checked="" type="checkbox"/>	NI N/A
6. Not Applicable			
7. For out-of-state manifests, was copy of 3 rd signature manifest submitted to Director? (Rule 304(2)(c))	262B	<input type="checkbox"/>	NI <input checked="" type="checkbox"/> N/A
8. Is the transporter used properly registered /permitted under Act 138, Section 3 (2)? (Rule 304(1)(c))	262B	<input checked="" type="checkbox"/>	NI N/A
9. Using manifest that has expired? (Rule 304(1)(a): 40 CFR 262.20(a))	262B	<input type="checkbox"/>	NI N/A
10. Reportable exceptions. (Rule 308(5): 40 CFR 262.42)(b))			
a) number of manifests generator HASN'T receive signed copy from TSD w/in 60 days.	262D		<i>NDNR</i>
b) number generator DID NOT submit copy of manifest & statement on non-confirmation of delivery to DEQ.	262D		

OR

11. Did the facility manifest hazardous waste off-site which:			
a) is reclaimed under contractual agreement & reclaimed material comes back? Rule 304(3)(a): 40 CFR 262.20(e))	262D	<input type="checkbox"/>	NI <input checked="" type="checkbox"/> N/A
b) does facility maintain copy of contractual agreement on-site for not less than 3 years? (Rule 304(3)(b): 40 CFR 262.20(e))	262D	<input type="checkbox"/>	NI <input checked="" type="checkbox"/> N/A

NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h)

LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (40 CFR 268.7)(Rule 311(1))

Note: Not all requirements applicable if waste shipped off-site and material returned under contractual agreement.

YES NO

12. Did the generator determine if the waste is restricted from land disposal? (40 CFR 268.7(a)(1))		
a) all listed waste	268A	<input checked="" type="checkbox"/> NI N/A
b) all characteristic wastes?	268A	<input checked="" type="checkbox"/> NI N/A

NOTE: If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))

13. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (40 CFR 268.7(a)(2))	268A	<input checked="" type="checkbox"/> NI N/A
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OR

14. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (40 CFR 268.7(a)(3))	268A	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
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OR

15. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (40 CFR 268.7(a)(4))	268A	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
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OR

16. If facility chooses alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (40 CFR 268.7(a)(9))	268A	<input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
17. Did the notice include: (40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3))		
a) EPA hazardous waste #?	268A	<input checked="" type="checkbox"/> NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	268A	<input checked="" type="checkbox"/> NI N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	268A	<input checked="" type="checkbox"/> NI N/A
d) manifest number associated with the shipment?	268A	<input checked="" type="checkbox"/> NI N/A
e) waste analysis data, where available?	268A	<input checked="" type="checkbox"/> NI N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	268A	<input checked="" type="checkbox"/> NI N/A

UNLESS

g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (40 CFR 268.7(a)(1) & 268.9)	268A	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? (40 CFR 268 Subpart D & 268.48)	268A	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A

NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)

NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."

18. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6))	268A	<input checked="" type="checkbox"/> NI N/A
19. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR 268.7(a)(7))	268A	<input checked="" type="checkbox"/> NI N/A
20. Were all notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8))	268A	<input checked="" type="checkbox"/> NI N/A

NOTE: This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (40 CFR 268.3) RULE 311(1)

21. Generator dilutes hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	268A	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
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TREATMENT STANDARDS (40 CFR 268.40) RULE 311(1)

22. If wastes exceeding treatment standards are mixed, were the most stringent standards selected? (40 CFR 268.40(c))	268A	<input checked="" type="checkbox"/> NI N/A
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PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

23. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a): 40 CFR 262.30)	262C	co. said <input type="checkbox"/> obsr'd <input type="checkbox"/> NI N/A
24. Are waste packages marked & labeled according to DOT concerning hazardous materials (required before shipping waste off-site)? (Rule 305(1)(b)&(c): 40 CFR 262.32(a))	262C	co. said <input type="checkbox"/> obsr'd <input type="checkbox"/> NI N/A
25. On containers 119 gallons or less, is there a warning, generator's name, address, manifest document # & waste code; 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	262C	co. said <input type="checkbox"/> obsr'd <input checked="" type="checkbox"/> NI N/A

26. If required (>1000 #s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	<input checked="" type="checkbox"/> NI N/A
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ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

27. If hazardous waste accumulated in containers: (If no, skip to #35)		
a) do containers have accumulation date & visible? (Rule 306(4)(c): 40 CFR 262.34(d)(4))	262C	<input checked="" type="checkbox"/> NI N/A
b) do container have words "Hazardous Waste"? (Rule 306(4)(d): 40 CFR 262.34(d)(4))	262C	<input checked="" type="checkbox"/> NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(4)(c))	262C	<input checked="" type="checkbox"/> NI N/A
d) has more than 180 (270 if over 200 miles) days elapsed since date marked? (Rule 306(4) or (5): 40 CFR 262.34(d) or (e))	262C	<input type="checkbox"/> NI N/A
e) has quantity of waste exceeded 6000 kg? (Rule 306(4)(a): 40 CFR 262.34(d)(1))	262C	<input checked="" type="checkbox"/> NI N/A

UNLESS

f) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	<input type="checkbox"/> NI N/A
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The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

g) are containers in good condition? (265.171)	262C	<input checked="" type="checkbox"/> NI N/A
h) are containers compatible with waste in them (265.172)	262C	<input checked="" type="checkbox"/> NI N/A
i) are containers stored closed? (265.173(a))	262C	<input checked="" type="checkbox"/> NI N/A
j) are containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))	262C	<input checked="" type="checkbox"/> NI N/A
k) are containers inspected weekly for leaks and defects? (265.174)	262C	<input checked="" type="checkbox"/> NI N/A
l) are incompatible wastes stored in separate containers? (265.177(a))	262C	<input checked="" type="checkbox"/> NI N/A
m) are hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	<input checked="" type="checkbox"/> NI N/A
n) are incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	<input checked="" type="checkbox"/> NI N/A
o) if facility accumulates over 1000 kg is there secondary containment which? (Rule 306(4)(b)(i))	262C	<input checked="" type="checkbox"/> NI N/A
i) if accumulating free liquids or F020, F021, F022, F023, F026 & F027, the hazardous waste accumulation area :		
A) has impervious base free of cracks? (264.175(b)(1))	262C	<input checked="" type="checkbox"/> NI N/A
B) is sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	262C	<input checked="" type="checkbox"/> NI N/A
C) holds 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	262C	<input checked="" type="checkbox"/> NI N/A
D) prevents run-on unless sufficient capacity? (264.175(b)(4))	262C	<input checked="" type="checkbox"/> NI N/A
E) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)(5))	262C	<input checked="" type="checkbox"/> NI N/A
ii) if accumulating solids, (other than F020, F021, F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c) (1&2))	262C	<input checked="" type="checkbox"/> NI N/A
28. If hazardous waste is being accumulated at the point of generation:		
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	<input checked="" type="checkbox"/> NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	<input checked="" type="checkbox"/> NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	<input checked="" type="checkbox"/> NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	<input checked="" type="checkbox"/> NI N/A

Rule 306(2) & 40 CFR 262.34(c)(1)(i) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

e) are container(s) in good condition? (265.171)	262C	<input checked="" type="checkbox"/> NI N/A
f) are container(s) compatible with waste in them? (265.172)	262C	<input checked="" type="checkbox"/> NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	<input checked="" type="checkbox"/> NI N/A
29. If generator exceeded 55 gallons or 1 quart, w/in 3 days did generator, w/respect to that amount of excess waste: (Rule 306(2): 40 CFR 262.34(c)(2))		
a) mark the container with the date the excess amount began accumulating?	262C	<input checked="" type="checkbox"/> NI N/A
b) move to an area with secondary containment?	262C	<input checked="" type="checkbox"/> NI N/A
30. Is hazardous waste accumulated in anything other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? Explain any yes answer.		<input checked="" type="checkbox"/> NI N/A
31. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	262C	<input checked="" type="checkbox"/> NI N/A
32. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(4)(j))	262C	<input checked="" type="checkbox"/> NI N/A
33. Is hazardous waste accumulated in tanks? If so, complete Tank System inspection form.		<input checked="" type="checkbox"/> NI N/A
34. Is hazardous waste placed on drip pads? If so, complete Wood Preserving inspection form		<input checked="" type="checkbox"/> NI N/A

PERSONNEL TRAINING (Rule 306(1)(d) & 40 CFR 262.34(a)(4))

		YES	NO
35. Emergency coordinator(s) identified & available at all times? (Rule 306(4)(f):40 CFR 262.34(d)(5)(I))	<i>None</i>	262C	<input checked="" type="checkbox"/> NI N/A
36. Next to phone is the following posted? (Rule 306(4)(g):40 CFR 262.34(d)(5)(ii)(A-C))			
a) name & phone number of emergency coordinator(s)	<i>None listed as of 1/1/11</i>	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
b) location of fire extinguishers, spill control equipment and fire alarms, if present?		262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
c) phone number of fire department (not needed if direct alarm)?	<i>Direct Alarm - OK</i>	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
37. Employees know waste handling & emergency procedures? (Rule 306(4)(h):40 CFR 262.34(d)(5)(iii))	<i>Many</i>	262C	<input checked="" type="checkbox"/> NI N/A
38. If facility has had emergency, did coordinator take appropriate response? (Rule 306(4)(i):40 CFR 262.34(d)(iv)(A-B))		262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A

AND

39. If there has been a fire, explosion or release which threatened human health or if spill reached surface water did facility call PEAS and NRC? (Rule 306(4)(i)(iii)(A-H):40 CFR 262.34(d)(5)(iv)(C)(1-5).	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
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Rule 306(4)(e) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37

40. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> co.said <input type="checkbox"/> obsrvd NI N/A
41. If required, does this facility have the following equipment:		
a) internal communications or alarm systems? (265.32(a))	262C	<input checked="" type="checkbox"/> NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	262C	<input checked="" type="checkbox"/> NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	262C	<input checked="" type="checkbox"/> NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	262C	<input checked="" type="checkbox"/> NI N/A
42. Testing and Maintenance of Emergency Equipment:		
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	262C	<input checked="" type="checkbox"/> NI N/A
b) has owner/operator provided immediate access to internal alarms? (265.34(a & b)) <i>NOTE: Access to communication or alarm system is applicable only if required 40 CFR 265.32</i>		
i) when hazardous waste is being poured, mixed, etc.	262C	<input checked="" type="checkbox"/> NI N/A
ii) if only one employee on the premises while facility is operating.	262C	<input checked="" type="checkbox"/> NI N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	262C	<input checked="" type="checkbox"/> NI N/A
43. Has the facility made arrangements with local authorities? (265.37(a)&(b))	<i>AAEM - 24 Hr</i>	262C <input checked="" type="checkbox"/> NI N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55

INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

44. Has the facility imported or exported hazardous waste?		<input checked="" type="checkbox"/> NI N/A
a) Exporting, has the generator:		
i) notified the Administrator in writing <12 months prior to shipment? (262.52(a))	262E	<input type="checkbox"/> NI N/A
ii) receiving country consented to accept waste. (262.52(b))	262E	<input type="checkbox"/> NI N/A
iii) has copy of EPA Acknowledgment of Consent. (262.52(c))	262E	<input type="checkbox"/> NI N/A
iv) complied with manifest requirements in Rule 309(2)(a-h).	262E	<input type="checkbox"/> NI N/A
v) if required, was an exception report filled. (309(3)(a-c))	262E	<input type="checkbox"/> NI N/A
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	<input type="checkbox"/> NI N/A

COMMENTS:

**Department of Environmental Quality
UNIVERSAL WASTE SMALL QUANTITY HANDLER
(SQH) INSPECTION**

Facility Name March Coatings, Inc.

Part 2 Rules

Date 1/26/2016

I.D. # MID982604001

1994 PA 451

SQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or less of all these wastes on site: antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.

Yes/No responses that are outside of the parenthesis are violations.

(NI - Not Inspected N/A - Not Applicable)

PROHIBITIONS (Rule 228(4): 40 CFR 273.11)

YES NO

1. Does SQH dispose of universal waste? (Rule 228(4): 40 CFR 273.11(a))	273.B	<input checked="" type="checkbox"/> NI N/A
2. Does SQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(4): 40 CFR 273.11(b))	273.B	<input checked="" type="checkbox"/> NI N/A

WASTE MANAGEMENT (Rule 228(4): 40 CFR 273.13, 273.14)

ANTIFREEZE: (Rule 228(4))

QTY HANDLED:

3. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.B	<input type="checkbox"/> NI N/A
4. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.B	<input type="checkbox"/> NI N/A
5. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C). [USE TANK CHECKLIST])	273.B	<input type="checkbox"/> NI N/A
6. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.B	<input type="checkbox"/> NI N/A
7. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(ii))	273.B	<input type="checkbox"/> NI N/A

BATTERIES: (Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h) requirements)

QTY HANDLED:

8. Are batteries managed in way to prevent releases? (Rule 228(4)(a): 40 CFR 273.13(a))	273.B	<input checked="" type="checkbox"/> NI N/A
9. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR 273.13(a)(1))	273.B	<input checked="" type="checkbox"/> NI N/A
10. Does the handler do any of the following activities w/ batteries as long as the casings of each battery is not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(4)(a): 40 CFR 273.13(a)(2))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
11. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input type="checkbox"/> NI N/A
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input type="checkbox"/> NI N/A
12. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(4)(a): 40 CFR 273.14(a))	273.B	<input checked="" type="checkbox"/> NI N/A

CONSUMER ELECTRONICS: (Rule 228(4))

QTY HANDLED:

13. Are electronics managed in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.B	<input type="checkbox"/> NI N/A
14. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.B	<input type="checkbox"/> NI N/A
15. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii))	273.B	<input type="checkbox"/> NI N/A
16. Does handler do anything beyond any of the following: repair electronics for direct reuse (Rule 228(4)(g)(i); remove other univ. wastes from cons. electronics (Rule 228(4)(g)(ii)); remove modular components for reuse (Rule 228(4)(g)(iii))	273.B	<input type="checkbox"/> NI N/A

ELECTRIC LAMPS: (Rule 228(4); 273.13(c); 273.14(d))**QTY HANDLED:**

17. Are lamps crushed or broken and facility trying to manage as universal waste? (universal waste electric lamps shall not be crushed or broken under MI rule) (Rule 228(4)(c)(i)) <i>Note: different from EPA regulation</i>	273.B	<input checked="" type="checkbox"/> NI N/A
18. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(4)(c)(ii))	273.B	<input type="checkbox"/> Y NI N/A
19. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(S)" or "USED ELECTRIC LAMP(S)". (Rule 228(4)(c)(iv)) <i>Note: different from EPA regulation</i>	273.B	<input type="checkbox"/> Y NI N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(4)(c)(iii)) <i>Note: different from EPA regulation</i>	273.B	<input checked="" type="checkbox"/> NI N/A
21. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(4)(c)(iii) (B)) <i>Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste</i>	273.B	<input checked="" type="checkbox"/> NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272?	273.B	<input checked="" type="checkbox"/> NI N/A
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451?	273.B	<input checked="" type="checkbox"/> NI N/A

MERCURY DEVICES: (Rule 228(4); 40 CFR 273.13 & 273.14)**QTY HANDLED:**

22. Are devices managed to prevent releases? (Rule 228 (4)(d): 40 CFR 273.13(c))	273.B	<input type="checkbox"/> NI N/A
23. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (4)(d): 40 CFR 273.13(c)(1))	273.B	<input type="checkbox"/> NI N/A
24. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S)" or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)". (Rule 228 (4)(d): 40 CFR 273.14(d))	273.B	<input type="checkbox"/> NI N/A
25. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(i & ii))	273.B	<input type="checkbox"/> NI N/A
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(iii & iv))	273.B	<input type="checkbox"/> NI N/A
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (4)(d): 40 CFR 273.13(c)(2) (v))	273.B	<input type="checkbox"/> NI N/A
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	<input type="checkbox"/> NI N/A
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vii))	273.B	<input type="checkbox"/> NI N/A
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(viii))	273.B	<input type="checkbox"/> NI N/A
26. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (4)(d): 40 CFR 273.13(c)(3))	273.B	<input type="checkbox"/> NI N/A
27. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (4)(d): 40 CFR 273.13(c)(3)(i)(A&B), 273.13(c)(4)(i))	273.B	<input type="checkbox"/> NI N/A
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (4)(d): 40 CFR 273.13(c)(4)(ii))	273.B	<input type="checkbox"/> NI N/A
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? (Rule 228 (4)(d): 40 CFR 273.13(c)(4)(iii))	273.B	<input type="checkbox"/> NI N/A

PESTICIDES: Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h)**QTY HANDLED:**

28. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(4)(a): 40 CFR 273.13(b)(1))	273.B	<input type="checkbox"/> NI N/A
29. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(4)(a): 40 CFR 273.13(b)(2))	273.B	<input type="checkbox"/> NI N/A
30. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? [USE TANK CHECKLIST] (Rule 228(4)(a): 40 CFR 273.13(b)(3))	273.B	<input type="checkbox"/> NI N/A
31. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(4)(a): 40 CFR 273.13(b)(4))	273.B	<input type="checkbox"/> NI N/A
32. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(s)" or "WASTE-PESTICIDE(s)" (Rule 228(4)(a): 40 CFR 273.14(b) [See 273.14(c) if 273.14(b) not possible]	273.B	<input type="checkbox"/> NI N/A

PHARMACEUTICALS: (Rule 228(4))**QTY HANDLED:**

33. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.B	<input type="checkbox"/> NI N/A
34. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.B	<input type="checkbox"/> NI N/A

35. Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv))	273.B	<input type="checkbox"/> NI N/A
36. If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (ii))?	273.B	<input type="checkbox"/> NI N/A

ACCUMULATION TIME LIMITS (Rule 228(4): 40 CFR 273.15)

37. Is universal waste accumulated one year or less? (Rule 228(4)(a): 40 CFR 273.15(a)) (if no go to question 38)	273.B	<input checked="" type="checkbox"/> NI N/A
38. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal? (burden on handler to demonstrate) (Rule 228(4)(a): 40 CFR 273.15(b)) <i>last shipment 2012</i>	273.B	<input type="checkbox"/> Y NI N/A
39. Is length of time universal wastes stored documented by one of the following:		
a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(4)(a): 40 CFR 273.15(c)(1))	273.B	<input type="checkbox"/> Y NI N/A
b. individual items of universal waste marked or labeled w/ earliest date it became a waste?? (Rule 228(4)(a): 40 CFR: 273.15(c)(2))	273.B	<input type="checkbox"/> Y NI N/A
c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(4)(a): 40 CFR 273.15(c)(3))	273.B	<input type="checkbox"/> Y NI N/A
d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4)(a): 40 CFR (273.15(c)(4))	273.B	<input type="checkbox"/> Y NI N/A
e. universal waste placed in a specific accumulation area & the earliest date is identified when waste was first put in area or date received? (Rule 228(4)(a): 40 CFR (273.15(c)(5))	273.B	<input type="checkbox"/> X NI N/A
f. any other method when demonstrates length of time universal waste accumulated & date it became a waste or received? (Rule 228(4)(a): 40 CFR (273.15(c)(6))	273.B	<input type="checkbox"/> Y NI N/A

EMPLOYEE TRAINING (Rule 228(4): 40 CFR 273.16)

40. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(4): 40 CFR 273.16))	273.B	<input checked="" type="checkbox"/> NI N/A
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RESPONSE TO RELEASE (Rule 228(4): 40 CFR 273.17)

41. Are releases of universal waste & other residue immediately contained? (Rule 228(4): 40 CFR 273.17(a))	273.B	<input checked="" type="checkbox"/> NI N/A
42. Is material from release characterized? (Rule 228(4): 40 CFR 273.17(b))	273.B	<input checked="" type="checkbox"/> NI N/A
43. If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(4): 40 CFR 273.17(b))	273.B	<input checked="" type="checkbox"/> NI N/A

OFF-SITE SHIPMENTS (Rule 228(4): 40 CFR 273.18)

44. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(4)(a): 273.18(a))	273.B	<input checked="" type="checkbox"/> NI N/A
45. If the SQH self-transport waste, does it comply with the universal waste transporter requirements? (Rule 228(4)(b))	273.B	<input type="checkbox"/> X NI N/A
46. If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/ marking/placards/shipping papers? (Rule 228(4)(a): 273.18(c))	273.B	<input checked="" type="checkbox"/> NI N/A
47. Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(4)(a): 40CFR 273.18(d))	273.B	<input checked="" type="checkbox"/> NI N/A
48. If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:		
a. receive the waste back? (Rule 228(4)(a): 40 CFR 273.18(e)(1))	273.B	<input type="checkbox"/> NI N/A
b. agree to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(e)(2))	273.B	<input type="checkbox"/> NI N/A
49. If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss either:		
a. sending the waste back to originating handler? : (Rule 228(4)(a): 40 CFR 273.18(f)(1)) OR	273.B	<input type="checkbox"/> NI N/A
b. agreeing to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(f)(2))	273.B	<input type="checkbox"/> NI N/A
50. If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(4)(a): 40 CFR 273.18(g))	273.B	<input type="checkbox"/> NI N/A
51. If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(4)(a): 40 CFR 273.18(h))	273.B	<input type="checkbox"/> NI N/A

EXPORTS (Rule 228(4): 40 CFR 273.20)

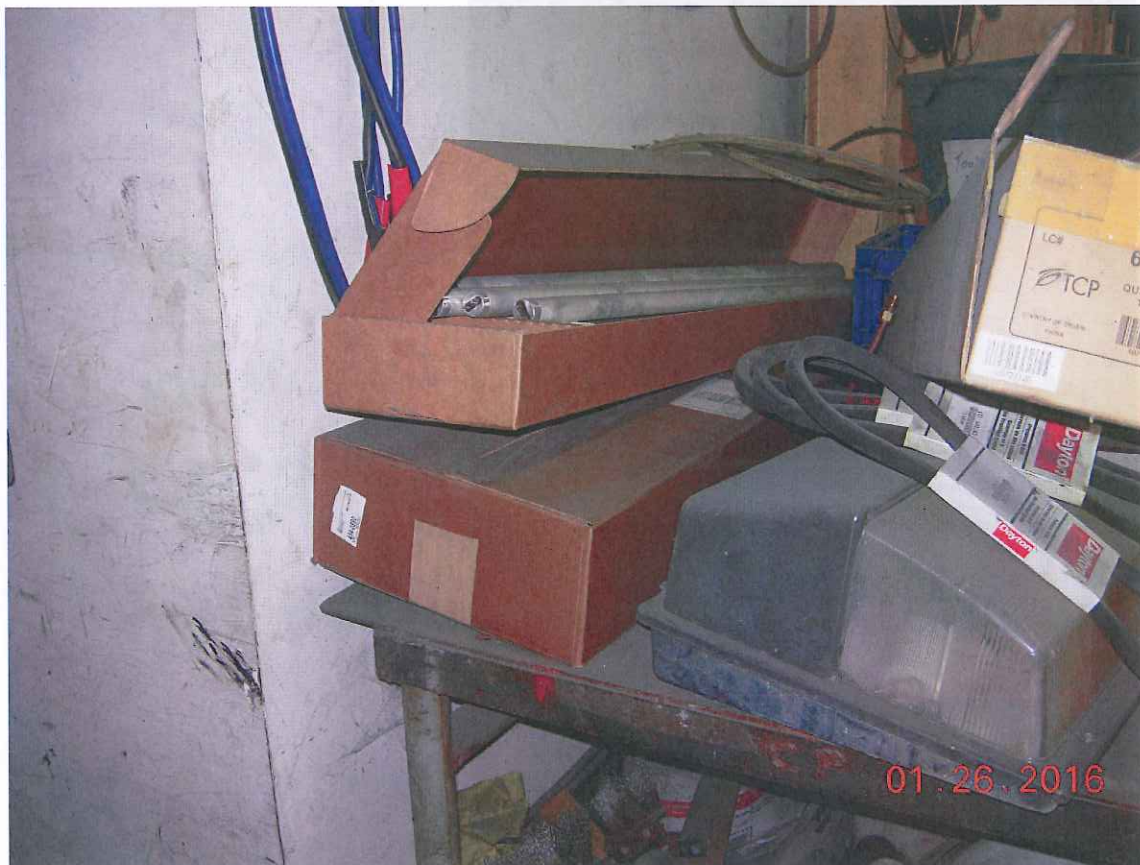
52. If waste is sent to a foreign destination does handler:		
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 & 6) and (b) and 262.57? (Rule 228(4): 40 CFR 273.20(a))	273.B	<input checked="" type="checkbox"/> NI N/A
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(4): 40 CFR 273.20(b))	273.B	<input type="checkbox"/> NI N/A
c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(4): 40 CFR 273.20(c))	273.B	<input type="checkbox"/> NI N/A

TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)

53. Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))	273.D	<input checked="" type="checkbox"/> [] NI N/A
54. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))	273.D	<input type="checkbox"/> [] NI N/A
55. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))	273.D	<input type="checkbox"/> [] NI N/A
56. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))	273.D	<input type="checkbox"/> [] NI N/A
57. Does transporter comply w/ USDOT requirements for package/labels/markings/placards/shipping papers if universal waste is also hazardous material? <i>Shipping papers cannot describe universal waste as "hazardous waste, (f) or (s), n.o.s."</i> <i>nor have waste added to USDOT proper shipping name.</i> (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))	273.D	<input type="checkbox"/> [] NI N/A
58. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)	273.D	<input type="checkbox"/> [] NI N/A
a. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a))	273.D	<input type="checkbox"/> [] NI N/A
b. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))	273.D	<input type="checkbox"/> [] NI N/A

COMMENTS:

[illegible]

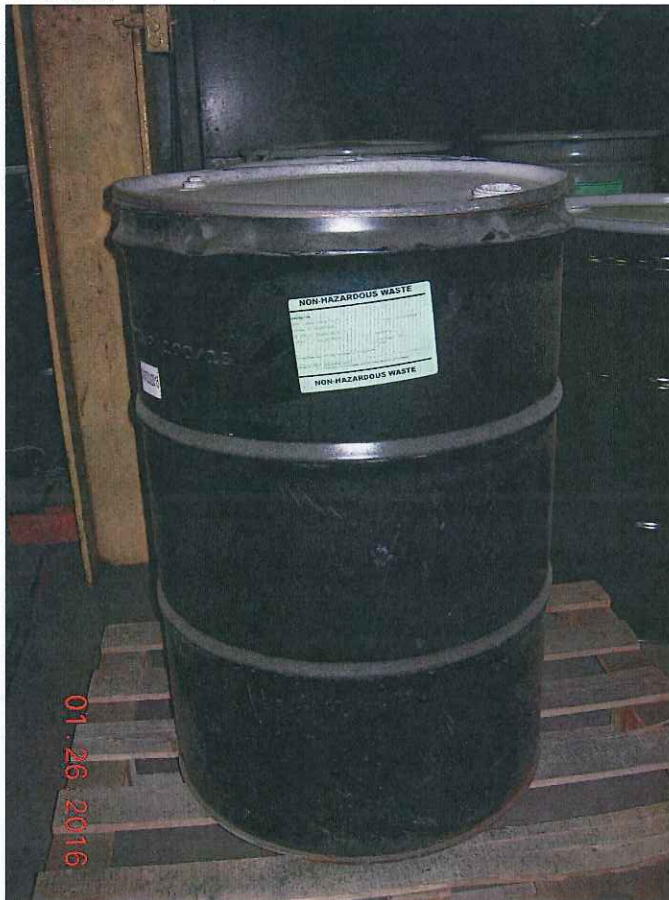


Photograph #1 – Maintenance Shop, Universal Waste Accumulation Area



Photograph #2 – Hazardous Waste Accumulation Area, Two 55-Gallon Containers

March Coatings, Inc.
Brighton, Michigan
1/26/2016



Photograph #3 – 55-Gallon Container of Shot Blasting Waste



Photograph #4 – Wastewater Treatment Plant Sludge